

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

Charles H. Cooper, :
Jr., :
Plaintiff, :
vs. Case No. 2:20-cv-3332
Longwood Forest Judge Michael H. Watson
Products, Inc., Magistrate Judge Jolson
et al., :
Defendants. :
: - - - -

DEPOSITION OF TERA NAREE PAULINE DEAN
VIA VIDEOCONFERENCE

Taken at Dean residence
Elyria, OH 44035
January 13, 2021, 10:02 a.m.

Spectrum Reporting LLC
400 South Fifth Street, Ste. 201
Columbus, Ohio 43215
614-444-1000 or 800-635-9071
www.spectrumreporting.com

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Exhibit A

1 A P P E A R A N C E S

2 ON BEHALF OF PLAINTIFF:

3 Law Office of Daniel R. Mordarski LLC
4 5 East Long Street, Suite 1100
Columbus, OH 43215
5 By Daniel R. Mordarski, Esq.
(Via videoconference)

6 and

7 C. Steven Rabold Co., LPA
8 6061 S. Broadway Avenue
Lorain, OH 44053
9 By C. Steven Rabold, Esq.
(Via videoconference)

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11 ON BEHALF OF DEFENDANTS:

12 Lane, Alton & Horst LLC
13 Two Miranova Place, Ste. 220
Columbus, OH 43215
14 By Edward G. Hubbard, Esq.
(Via videoconference)
Joseph Gerling, Esq.
(Via videoconference)

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1 youngest, would not have been there. Other than
2 children that you described and [REDACTED], is there
3 anybody else that would have lived in Columbus
4 with you?

5 A. Besides their father Jerry, no.

6 Q. Okay. Did Mr. Boone live at that
7 address in Columbus?

8 A. He was staying with me, yes.

9 Q. Okay. Was he on the lease?

10 A. No.

11 Q. Okay. Did he stay there throughout the
12 length of your lease term?

13 A. No. He had actually just came -- he
14 lost his apartment, so he was looking for a new
15 apartment. So I was letting him stay there.

16 Q. Okay. When did he lose his apartment
17 and move into the address in Columbus?

18 A. I'll say about -- right in April.

19 Q. Okay. April of 2018?

20 A. 2018, yes.

21 Q. I'm sorry. Did you say '19 or '18?

22 A. 2018.

23 Q. Okay. Where does Mr. Boone live today?

24 A. Mr. Boone resides in Elyria also.

1 to the bed rail?

2 A. It was attached just like this, both
3 hooks were attached to that wooden piece and I
4 just lifted it up and removed it.

5 Q. Okay. Let me rephrase the question.

6 Were the hooks attached in any way to the bed rail
7 that you would be required to loosen before you
8 would take the ladder off?

9 A. Oh, no. They were never attached.

10 They were just -- it was like a removable ladder.

11 Q. And would you remove it in other
12 circumstances such as vacuuming the floor or -- I
13 mean, that's the scenario that comes to my mind.
14 But for any other purpose?

15 A. No, sir. That was the only time I did
16 remove it. Excuse me.

17 Q. At any time when the kids were in the
18 room and either on the bed or around the bed, did
19 you take any pictures of them?

20 A. No.

21 Q. So before this incident, is it fair to
22 say you never took any pictures where the bunk bed
23 was in the picture?

24 A. Yeah.

1 Q. And from the pictures, it appears that
2 there is a fairly deep shag carpet in the bedroom;
3 is that correct?

4 A. Uh-huh. Yes.

5 Q. Are you aware of any incidents where
6 the ladder ever slipped out because the bottom
7 rails of the ladder slipped on the carpet?

8 A. No. Actually, the carpet kind of gave
9 it the security for it to stay in place.

10 Q. How many times had you removed the
11 ladder from the top rail?

12 A. One time.

13 Q. Okay. I want to talk about the
14 incident on May 22nd, 2018. My understanding it
15 was around 3:00; is that correct?

16 A. Correct.

17 Q. Okay. What had been going on that day
18 around the house?

19 A. Woke up, started my day off normal.
20 Got the kids dressed. Got my oldest off to the
21 bus. Fed them cereal. We went out, went to the
22 mall. I got my eyebrows done. We walked around.
23 We left. I took them to Burger King to receive
24 lunch. Came back home, they sat down, they ate

1 lunch. Jerry was just leaving out to go to his
2 probation officer or counseling or something. I'm
3 not sure. And he had just left and the kids were
4 -- after they got done eating lunch, they asked to
5 go outside and play. But I was kind of exhausted
6 from being up early that morning, and I told them
7 that they can play upstairs for a little bit, we
8 weren't going outside. I went to the restroom
9 downstairs, my master restroom that was connected
10 to my bedroom. [REDACTED] and [REDACTED] went
11 upstairs to play.

12 I was in my restroom using the
13 bathroom, a No. 2, smoking my cigar and looking
14 through my phone. And not even five minutes later
15 my son [REDACTED] came downstairs and says, Mommy,
16 come, come now. And something came over me and I
17 ran upstairs. And [REDACTED] was hanging in the
18 ladder and he was turning purple. He wasn't
19 responsive. So I tried to pull him out the ladder
20 forward and I couldn't do it. So I went behind
21 and took him from behind the ladder from his legs
22 and I had to pull him out that way. I struggled
23 to get him out.

24 But when I finally got him out of